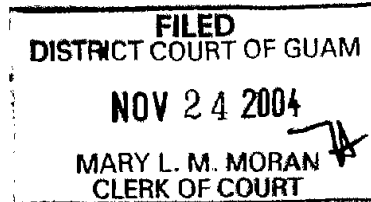


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Attorney for Lourdes M. Perez and Artemio R. Ilagan

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF GUAM**

JULIE BABAUTA SANTOS, et. al.,

Petitioners,

vs.

FELIX P. CAMACHO, etc., et. al.,

Respondents.

Civil Case No. 04-00006

**DECLARATION OF JOSEPH C.
MANIBUSAN IN SUPPORT OF
DEFENDANT'S, LOURDES M. PEREZ
AND ARTEMIO R. ILAGAN OBJECTION
TO (1) PETITIONER'S MOTION FOR
ORDERS APPROVING THE
ADMINISTRATION PLAN AND AMENDED
NOTICE; AND (2) THE ATTORNEY
GENERAL OF GUAM'S MPA IN
RESPONSE TO MOTION FOR ORDERS
APPROVING ADMINISTRATION PLAN**

I, JOSEPH C. MANIBUSAN, declare that:

1. I am the Deputy Director of the Department of Administration. On June 12, 2004, I received a call to meet with the Lieutenant Governor in his chambers on Sunday, June 13, 2004, at 3:00 p.m.

2. At the time, I was the acting Director for the Department of Administration since the Director, Lourdes Perez, was off-island at the time.

3. When the Declarant arrived at the Lieutenant Governor's chambers, he was advised by the Lieutenant Governor that they were going to be signing settlement for the Earned Income Tax Credit lawsuit and that a press conference would be held.

ORIGINAL

1 4. The Declarant was later informed by the Lieutenant Governor that he would
2 be signing the settlement agreement. The Declarant was never given the settlement
3 agreement to review.

4 5. The Declarant was sitting next to the Department of Revenue and Taxation
5 Director, Artemio Ilagan, in which both individuals shared the sentiments that they were
6 signing something they had not examined and reviewed.

7 6. The Declarant stated that he wanted to review the document to see how it
8 would impact his department but did not know how to bring the matter to the attention of
9 the acting governor since all parties were there to execute the agreement.

10 7. The Declarant though thought that he did not have a choice or the right to
11 refuse to sign or challenge the acting governor at the time. The Declarant believed that
12 he had no option to challenge or refuse to sign and to do so at the time would result in his
13 dismissal. The Declarant executed the document under the duress and fear.

14 8. The Declarant states that he normally would not execute such an agreement
15 without consulting with the Director of Administration who was off-island and in transit at
16 the time.

17 I declare under penalty of perjury pursuant to the laws of the United States and of
18 the Territory of Guam that the foregoing declaration is true and correct.

19 Executed this 24 day of November, 2004.

20 
21 JOSEPH C. MANIBUSAN

22 SWORN AND SUBSCRIBED to before me this 24 day of November, 2004.

